

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

Associated Recovery, LLC,	)	
	)	
Plaintiff,	)	
	)	No. 1:15-cv-1723-AJT-JFA
v.	)	
	)	
John Does 1-44,	)	
	)	
Defendants.	)	
	)	

In re:

744.COM	LNМ.COM	VGJ.COM	YQT.COM
028.COM	LUOHE.COM	WYD.COM	YRN.COM
3DCAMERA.COM	MEQ.COM	XAQ.COM	YTE.COM
FNY.COM	OCU.COM	XFF.COM	YYG.COM
FX2.COM	PIXIE.COM	XSG.COM	ZDP.COM
FXF.COM	QMH.COM	YCX.COM	ZHD.COM
JTZ.COM	RUTEN.COM	YEY.COM	ZULIN.COM
KGJ.COM	SDU.COM	YGX.COM	ZZM.COM
KMQ.COM	SQG.COM	YJR.COM	
KOU.COM	TAOLV.COM	YJX.COM	
KXQ.COM	UHW.COM	YLZ.COM	
KXW.COM	VCZ.COM	YQP.COM	

**PLAINTIFF’S MOTION FOR DEFAULT JUDGMENT**

Pursuant to Federal Rules of Civil Procedure 55(b)(2), the Plaintiff Associated Recovery, LLC (the “Plaintiff” or “Associated Recovery”), by counsel, respectfully moves for entry of default judgment against the Internet domain names: 744.com, 3dcamera.com, fxf.com, jtz.com,

kou.com, ocu.com, ruten.com, sdu.com, uhw.com, vgj.com, yey.com, yjx.com, ylz.com, and yte.com, (collectively the “Defaulted Domain Names”). The Plaintiff alleges that the Defendant Defaulted Domain Names have violated the Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d) pursuant to the uncontested pleadings and evidence submitted herewith.

The Plaintiff seeks the transfer of the Defaulted Domain Names to the exclusive ownership and control of the Plaintiff. This application for default judgment is based on this Motion and the accompanying Memorandum, as well as the Clerk of Court’s Entry of Default. *See* Dkt. 12.

Date: March 4, 2016

Respectfully,

/s/

Rebecca J. Stempien Coyle (VSB# 71483)  
Counsel for the Plaintiff  
**Associated Recovery, LLC**  
LEVY & GRANDINETTI  
1120 Connecticut Avenue, N.W., Suite 304  
Washington, D.C. 20036  
Telephone (202) 429-4560  
Facsimile (202) 429-4564  
mail@levygrandinetti.com

**CERTIFICATE OF SERVICE**

I, Rebecca J. Stempien Coyle, certify that on March 4, 2016, I electronically filed the foregoing PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT by using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Claire M. Maddox  
DENTONS US LLP  
1900 K Street, N.W.  
Washington, D.C. 20006  
[claire.maddox@dentons.com](mailto:claire.maddox@dentons.com)

I also sent copies for the following domain names: 744.com, 3dcamera.com, fxf.com, jtz.com, kou.com, ocu.com, ruten.com, sdu.com, uhw.com, vgj.com, yey.com, yjx.com, ylz.com, and yte.com. The copies were sent to the registrants of the domain names by e-mail on March 4, 2016, and by air mail on March 7, 2016, at the following postal and e-mail addresses provided by the registrants to the registrars:

Domain ID Shield Service Co.  
5/F Hong Kong Trade Centre, 161-167 DesVoeux Road Central  
Hong Kong 999077, China  
[745187165637504@domainidshield.com](mailto:745187165637504@domainidshield.com)

Taesong Chong  
D-805 Central Star, Bujeon Jin-gu  
Busan 614-030, Korea  
[komorijin@gmail.com](mailto:komorijin@gmail.com)

WhoisGuard Protected, WhoisGuard, Inc.  
P.O. Box 0823-03411  
Panama City, Republic of Panama  
[15B93ABAFD0B47E787820FDA56E25280.PROTECT@WHOISGUARD.COM](mailto:15B93ABAFD0B47E787820FDA56E25280.PROTECT@WHOISGUARD.COM)

Chang Su, Su Chang  
A2-505 Linhai Mountain Villa, Xiameilin Beihuan Road  
Shenzhen 518003, China  
[suchang1978@yahoo.com](mailto:suchang1978@yahoo.com)

WHOIS AGENT, DOMAIN WHOIS PROTECTION SERVICE  
17F, No. 138 Zhognshan Avenue  
Guangzhou, Guangdong 510000, China  
[whoisagent@hupo.com](mailto:whoisagent@hupo.com)

Xiamen eName Network Co., Ltd.  
Software Park, Wanghai Road No. 19, 603  
Xiamen Shi, Fujian 361000, China  
[kf94hfkkfm@enamewhois.com](mailto:kf94hfkkfm@enamewhois.com)  
[03ur3t0sx@enamewhois.com](mailto:03ur3t0sx@enamewhois.com)

Whois Privacy Corp.  
Ocean Centre, Montagu Foreshore, East Bay Street  
Nassau, Bahamas  
[5435a938ino23cjbv@5225b4d0pi3627q9.whoisprivacypcorp.com](mailto:5435a938ino23cjbv@5225b4d0pi3627q9.whoisprivacypcorp.com)

Mr. Chen  
Fujian, Beijing  
Beijing 100824, China  
[chinaloy@126.com](mailto:chinaloy@126.com)

Lvchangbing  
Shuiguohu  
Wuhan Shi, Hubei 430071, China  
[3296868@qq.com](mailto:3296868@qq.com)

YinSi BaoHu Yi KaiQi  
3/F HiChina Mansion, No. 27 Gulouwai Avenue  
Dongcheng District, Beijing 100120, China  
[YuMing@YinSiBaoHu.AliYun.com](mailto:YuMing@YinSiBaoHu.AliYun.com)

Linchunmei  
Tianhe Ruanjian Yuan  
Guangzhou Shi, Guangdong 510665, China  
[leetwei@126.com](mailto:leetwei@126.com)

ChenLongshui, Bozong Net. Ltd.  
Shenzhen Guangdong  
Shenzhen Shi, Guangdong 518000, China  
[chenls@bzw.cn](mailto:chenls@bzw.cn)  
Lior Navi

Hanasi 6  
Haifa 34323, Israel  
[jerolior@gmail.com](mailto:jerolior@gmail.com)

/s/

---

Rebecca J. Stempien Coyle (VSB# 71483)  
Counsel for the Plaintiff

**Associated Recovery, LLC**

LEVY & GRANDINETTI

1120 Connecticut Avenue, N.W., Suite 304

Washington, D.C. 20036

Telephone (202) 429-4560

Facsimile (202) 429-4564

[mail@levygrandinetti.com](mailto:mail@levygrandinetti.com)